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January 23, 2025

VIA ECF

Honorable Vernon S. Broderick U.S. District Judge, Southern District of New York. United States Courthouse 40 Foley Square, Courtroom 518 New York, NY 10007

Re:

John and Mary Doe v. Markel, Evanston Insurance Company

Index No. 24-cv-09670-VLB-KHP

Dear Judge Broderick:

I am the attorney for the Plaintiffs in this matter. Previously, this Court granted the parties' joint application establishing a schedule setting January 31, 2025 as the deadline for Plaintiffs to make a motion to remand and as the deadline for Defendant's time to answer, move, or otherwise respond to the Complaint and granting Plaintiffs leave to proceed anonymously until February 14, 2025 unless Plaintiffs file a motion to proceed anonymously by February 14, 2025, which motion will extend the leave until the Court's decision on Plaintiffs' motion. *ECF Doc. 3.* Plaintiff has now filed a Motion to Remand, and, if this matter is remanded then an answer or Motion to Dismiss in lieu of an answer and a Motion for Anonymity would be moot as this Court would no longer have jurisdiction.

The parties hereby jointly request that the Court grant Defendant until February 14, 2025, to oppose Plaintiffs' Motion to Remand, Plaintiff will have until February 28, 2025 to submit a Reply. The Parties further seek the Courts direction as to whether, in the interest of judicial economy, the Court would like to issue an opinion on the Motion to Remand, after it is fully submitted, prior to any additional motion practice. If so, the parties can submit a revised scheduling order for the remaining motion practice after the Court's ruling on the Motion to Remand.

Thank you in advance for your consideration.

Darren Epstein

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